

# Our Privacy Policy

## 1) Introduction

Sapphire Elite Pty Ltd (ABN: 92 624 660 402) and its agents (**Sapphire Elite, we, our, us**) respect the importance of protecting your privacy. We comply with our obligations under the Privacy Act 1998 (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**) concerning personal information of individuals.

This Privacy Policy describes how Sapphire Elite collects, handles, uses and discloses your personal information. By providing us with your personal information, you consent to us using and disclosing it for the purposes set out in this Privacy Policy. We will update this Privacy Policy when our information handling practices change, or when required. Any revised Privacy Policy will take effect when it is published on our website.

## 2) Our functions and activities

We collect, hold, use and disclose your personal information so that we can perform our functions and activities and provide best possible customer service. Our collection, use and disclosure of your personal information will depend on our relationship with you, the circumstances of collection and the type of products and service you request from us. We may collect, hold, use and disclose your personal information for the following purposes:

- To provide and administer our products and services, including market properties for vendors and landlords, facilitate transactions for sales and leasing, verify your identity, conduct credit checks and process payments if applicable;
- To respond to your submissions and enquiries about our products and services and property listings;
- To provide customer support, including conducting, investigating and responding to enquiries, surveys, feedback, comments and complaints;
- To distribute our newsletters and other communications either alone or with the assistance of third party service providers on information about us, and our property listings;
- To inform and conduct marketing activities including to promote our products and services;
- To conduct research about your interests and attitudes towards our products and services to improve our products and services, marketing activities and customer experience;
- To assess the performance of our websites and improve the operation of the websites;
- To perform data analyses and generate customer insights which may include combining personal information from reputable data sources and public sources of information;
- To manage and carry out our business and operational functions, including HR management, business decisions and assessing your suitability for appointment as a salesperson
- To maintain records and comply with our legal obligations.

## 3) Information we collect

Personal information is any information about you, from which you can be identified. We may collect your name, address, postcode, email address, date of birth, gender, employment, telephone number, property details, payment details and proof of identity such as your driver licence or passport number. We may collect additional personal information from you from time to time.

We generally do not collect sensitive information about you, unless you provide it to us voluntarily. For example, when you interact with one of our agents, you may provide sensitive information such as racial or ethnic origin, sexual orientation, health information, religious or philosophical beliefs or political opinion and membership or affiliation information. You consent to us collecting sensitive information which you provide to us voluntarily. If we need to collect any sensitive information for a specific purpose, we will ask for your consent.

If you are an employee or prospective employee, we may need to collect sensitive information about you and you consent to us collecting this information. For example, personnel records may include sensitive information such as place of birth, racial or ethnic origin, criminal record, tax file number, disabilities and relationship information. Recruitment records may include employment history and experience, referees and other employment related information.

If you provide us sensitive information, we will treat it as personal information and handle it in accordance with this Privacy Policy.

You don't have to give us all the information we request. However, if you do not provide us with some or all of the personal information required, we may not be able to provide you with the products and services or

information you request, to the requested standard or at all, and you may also miss out on receiving valuable information about us and our products and services.

#### 4) How we collect information

Where we can, we will collect information directly from you. We collect personal information when you:

- Request us to provide our products and services or information about our products and services, including sales, and leasing
- Contact us to make an enquiry about our listed properties or our products and services, including online, over the phone or in person;
- Subscribe to communications from us such as updates, publications or newsletters;
- Tell us about your preferences when making an enquiry or using our products and services;
- Contact us to provide feedback, comments or suggestions on our functions and activities or complete one of our surveys;
- Interact or engage with us through our websites or social media platforms;
- Attend property inspections or visit our office
- Apply for a job with us or become an employee, or become a supplier or contractor that provide a product or service to Sapphire Elite;
- Otherwise interact with us or disclose your personal information to us.

As well as collecting information directly from you, there may be occasions when we may collect information about you from other people or organisations. We may combine this information with information we already have about you to help us understand trends, attributes, behaviour and preferences. Where we receive information about you indirectly from third parties, we require that the third party has collected and shared that information in accordance with the Privacy Act.

Third parties we collect information about you from may include:

- Reputable data sources and publicly available sources of information;
- Your representatives (lawyers, mortgage broker, accountants and financial advisors);
- Your nominated referee or employer when you apply to rent a property
- Third parties that provide marketing leads, marketing and data analysis services to us;
- Third parties that conduct our surveys for us;
- If you are a prospective employee, your nominated referee, law enforcement agencies for police checks or intermediaries such as recruitment agents and personnel providers.

#### 5) Cookies and how we use them

We also collect general information about you when you use our websites. This might include your geo-location, IP address, the browser and operating system you are using, and details of websites that IP address has come from, the pages accessed on our website and the next website visited.

We also use cookies, which are small data files placed on your computer that allows our website to “remember you” when you return to our website. We do this to monitor visitor traffic information and actions on our website, maintain, secure and improve our websites and enhance your experience when using our website. This information is aggregated and anonymous and will not be used to personally identify you. If you want to prevent cookies being used, you can change your browser settings to disable cookies. However, you may not be able to access all or parts of our websites, or you may experience reduced functionality when accessing certain services.

#### 6) Disclosure of personal information

Sapphire Elite may disclose your personal information to our agents and contractors.

We may disclose your personal information to third parties in connection with our functions and activities, including:

- To the other parties in the transaction for sale and leasing, including developers, vendors, landlords, purchasers and tenants, and their authorised representative;
- To your authorised representatives (lawyers, mortgage brokers, accountants and financial advisors);
- To regulatory bodies, government agencies and law enforcement bodies in any jurisdiction;
- To debt collectors and utility companies;
- When we may be required by law from time to time.

We may also disclose personal information to our suppliers and service providers that provide products and services to us in connection with our functions and activities, including third parties who:

- Deliver marketing and digital marketing services;
- Mailing, courier and print service providers;
- Conduct data analysis and data matching services;
- Conduct market research, surveys and analysis;

- Host our servers and websites;
- Provide IT services;
- Data processing, storage and back-up; or
- Process payments;
- Manage HR information such as payroll and superannuation; or

We require that all third parties, to whom we disclose personal information or who may have access to personal information, have appropriate controls to protect your personal information in a manner that is consistent with our Privacy Policy, including in relation to security and confidentiality. They must only use your personal information for authorised purposes.

#### 7) Direct Marketing

Sapphire Elite may, from time to time, send direct marketing communications to you about us and our products and services, our property listings and other material that we consider you would find interesting or useful. If you do not wish to receive such direct marketing communications, you can always opt out. If you are receiving email communications from us, there will be a mechanism to opt out contained in each of those emails. To stop receiving other communications from us, you can contact us via any of the channels listed below.

If you choose to opt out of all direct marketing communications, please note that Sapphire Elite may still contact you for other reasonable purposes, including information that Sapphire Elite is legally required to send, notifications of changes to Sapphire Elite products and services or policies and information regarding the use, rights, benefits or obligations of customers of our products and services.

#### 8) How we hold information and keep it secure

Sapphire Elite holds your personal information both electronically, on our own servers and those of our service providers, and in hard copy at our secured place of business.

Sapphire Elite takes the security of your personal information seriously and we implement a range of technical, administrative, personnel and physical measures to safeguard your personal information against loss, interference and unauthorised access, modification and disclosure, and misuse, including using electronic and physical access restrictions to files containing personal information and ensuring encryption of personal information sent and received.

#### 9) Access and correction of information about you

It is important to us that the information we hold about you is up-to-date, accurate and complete, and we will try to confirm your details through our communications with you and promptly add updated or new personal information to existing records when we are advised. If any of your details change, please notify us as soon as you can. If you believe we are holding information about you that is inaccurate, incomplete, irrelevant or misleading, you can ask us to correct it, or delete it altogether.

If you would like to access your personal information, or ask us to update, correct or delete it, you can do so by contacting us in writing and verifying your identity. We will do our best to respond to your request within 30 days.

We will only refuse access in exceptional circumstances, and if this is the case, we will advise you of our reasons for doing so.

We may charge a fee for searching for, and providing access to, your information on a per request basis.

#### 10) Privacy complaints and further information

We take your complaints seriously and will attempt to resolve your issue quickly and fairly.

If you believe that Sapphire Elite has breached the APPs, or you have a complaint about how we handle your personal information:

- You may make a complaint addressed to the Sapphire Elite Managing Director. The complaint must identify you and be in writing.
- The Managing Director will investigate your complaint and will endeavour to provide a response setting out Sapphire Elite's decision in writing within 30 days of receipt of your complaint.
- If Sapphire Elite is unable to satisfactorily resolve your concerns you can contact the Office of the Australian Information Commissioner on their website [www.oaic.gov.au](http://www.oaic.gov.au).

#### 11) Our contact details

If you require any further information or have any questions about this Privacy Policy or if you wish to access or correct your personal information or make a complaint about our handling of that information, please contact the Managing Director as follows:

Email: [office@sapphireelite.net](mailto:office@sapphireelite.net)

Telephone: 07 5543 6012

Post: Managing Director  
Sapphire Elite  
Po Box 98 Tamborine QLD 427